

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DISTRICT**

UNITED STATES OF AMERICA,)	CASE NO. 1:20-CR-392
)	
Plaintiff,)	JUDGE SOLOMON OLIVER, JR.
)	
)	
vs.)	
)	
CHARLES VACCARO, <i>et al.</i> ,)	<u>MOTION TO WITHDRAW</u>
)	<u>AS LOCAL COUNSEL</u>
Defendant.)	
)	

Now comes the undersigned, Ian N. Friedman and Eric C. Nemecek, of the law firm of Friedman & Nemecek, L.L.C., and hereby respectfully move this Honorable Court to withdraw as local counsel for Defendant Charles Vaccaro and his attorney, Randy Zelin. As the Court is aware, Attorney Zelin is primary counsel for Defendant Vaccaro and has been admitted *Pro Hac Vice* to practice before this Court. Defendant Vaccaro retained the undersigned to assist Attorney Zelin with acclimating to the Court's policies and procedures. Attorney Zelin is familiar with the applicable rules of procedure as well as his ethical obligations, and he has demonstrated his ability to comply with the same. Accordingly, the undersigned submits that withdrawal is appropriate at this time. Moreover, in light of the limited scope and involvement of the undersigned's representation in this case, it is respectfully submitted that permitting counsel to withdraw at this juncture will not result in any undue burden to the other parties, nor will it impede the timely disposition of this case. Attorney Zelin was notified in writing that undersigned counsel intended on filing the instant Motion today. Moreover, Attorney Zelin will notify the client as it was counsel that

engaged the services of the law firm. This District does not require local counsel. As such, our services are not necessary moving ahead.

WHEREFORE, the undersigned hereby respectfully move this Honorable Court for permission to withdraw as local counsel on behalf of Defendant, Charles Vaccaro, in the above-captioned matter.

Respectfully submitted,

/s/ Ian N. Friedman

IAN N. FRIEDMAN (0068630)

ERIC C. NEMECEK (0083195)

Counsel for Defendant

Friedman & Nemecek, L.L.C.

1360 East 9th Street, Suite 650

Cleveland, OH 44114

P: (216) 928-7700

F: (216) 820-44659

E: inf@fanlegal.com

ecn@fanlegal.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Withdraw was filed on the 19th of April, 2022 by CM/ECF, which will send a notification of electronic filing (NEF) to the parties.

Respectfully submitted,

/S/ Ian N. Friedman
IAN N. FRIEDMAN
ERIC C. NEMECEK
Counsel for Defendant